



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DMP:NJM  
F. #2015R01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 1, 2017

By FedEx and ECF

Robert J. Cleary, Esq.  
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Brittany N. Benavidez, Esq.  
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Eleven Times Square  
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang  
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, some of which has been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the "February 22 Order"). This disclosure supplements the government's earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, and October 24, 2017. The government renews its request for reciprocal discovery from the defendant.

Enclosed are the following:

- Documents from the Bank of China, which have been designated "Sensitive Discovery Material" under the February 22 Order. (DZ062900-DZ062986);
- Documents from the United States Department of State, including additional information relating to the visa applications and visas specified in your September 22, 2017 letter, which have been designated "Sensitive Discovery Material" under the February 22 Order. (DZ062987-DZ063068); and

- A disc containing electronically stored information (“ESI”) obtained by the government pursuant to search warrants, which has been designated “Sensitive Discovery Material” under the February 22 Order. (ESI00003912-ESI000004667).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE  
Acting United States Attorney

By: /s/ Nicholas J. Moscow  
Alexander A. Solomon  
Douglas M. Pravda  
Ian C. Richardson  
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Enclosures (DZ062901-DZ063068)  
(ESI00003912-ESI000004667)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)